

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

THE NEW YORK TIMES COMPANY

Plaintiff,

v.

MICROSOFT CORPORATION, OPENAI, INC.,  
OPENAI LP, OPENAI GP, LLC, OPENAI, LLC,  
OPENAI OPKO LLC, OPENAI GLOBAL LLC,  
OAI CORPORATION, LLC, and OPENAI  
HOLDINGS, LLC,

Defendants.

Civil Action No. 1:23-cv-11195 (SHS)

**NOTICE OF MOTION AND MOTION  
FOR ADMISSION *PRO HAC VICE***

PURSUANT TO Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, Carrie A. Beyer, hereby moves this Court for an Order for admission to practice *Pro Hac Vice* to appear as counsel for Defendant Microsoft Corporation in the above-captioned actions. I am in good standing of the bar of the State of Illinois and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached an affidavit pursuant to Local Rule 1.3.

**FAEGRE DRINKER BIDDLE & REATH LLP**

Dated: Chicago, Illinois  
July 11, 2024

By: /s/ Carrie A. Beyer  
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